



Oregon Wireless Instructional Network

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Oregon WIN

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May 24, 2004

Commissioner Martin
Federal Communication Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: WT Docket No. 03-66

Dear Commissioner Martin,

The educational institutions represented by the Oregon Wireless Instructional Network (Oregon WIN) strongly support the proposed ITFS technical rules under consideration by the Federal Communication Commission (FCC). However, as the FCC updates the technical rules for ITFS to more effectively support a range of new broadband services, **I urge you to reject proposals to allow any ITFS spectrum to be sold to commercial entities, or to reduce the total amount of spectrum allocated to ITFS.** Any changes in current ITFS license eligibility or spectrum allocation would seriously jeopardize our 10-year investment in education and public affairs services in Oregon and greatly limit our ability to expand new educational services to all Oregonians.

Oregon WIN (<http://oregonwin.org>) is a consortium of community colleges and public universities that operates under an intergovernmental agreement to provide health, education and public affairs programs to over 450,000 homes in Oregon and to over 100 schools, universities, fire stations, hospitals, and state government "One-stops." The Oregon WIN consortium operates a network of microwave and fiber-optic links that connect 5 ITFS transmit sites in Oregon, providing coverage to over 75% of Oregonians. Our plans for statewide expansion hinge on the continued availability of ITFS spectrum for educational use.

The Oregon WIN network currently provides a wide range of educational and public service programs to thousands of students and viewers.

- The Oregon Public Affairs Network (OPAN) reaching 450,000 homes and schools through last mile ITFS connections with public access cable channels. OPAN provides live coverage of the Oregon Legislature as well as extensive coverage of political debates, commission hearings, lectures, and conferences. OPAN is the only service that provides Oregonians coverage of state government and in-depth reviews of public affairs issues critical to civic life in Oregon.
- Oregon WIN allows community colleges to share telecourses among campuses. Savings are achieved by coordinating broadcasts among campuses rather than having each campus originate the same telecourses. WIN presently airs 10 – 12 telecourses a day to over 20,000 distance learning students.
- Oregon WIN allows universities to share advanced engineering programs, healthcare courses and other graduate programs, providing students access to a wider variety of courses during a time of serious budget cutbacks.

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Although Oregon WIN has made exceptional use of the ITFS spectrum as presently configured, we have been hampered by the uncertainty surrounding the spectrum for the past five years. Our distance education programs have moved rapidly into online formats making use of web applications, streaming video and IP videoconferencing. We look forward to converting our ITFS channels to digital applications and to the commercial build-out of high-speed wireless services to the many place-bound students unable to access DSL or cable modems. The new ITFS technical rules provide the framework for our commercial partner to successfully provide these much needed services.

It is time to establish new and clear options for the development of the ITFS spectrum, but this must be done in a manner that protects the investments put forth by colleges and universities across the country and protects the ITFS spectrum for educational use. Oregon campuses face serious budget constraints as state revenue continues to drop with no bottom in sight. During the past 24 months Oregon universities and community colleges faced state budget cuts of 10 to 20%. Oregon WIN has provided critical educational services to Oregonians as a result of our collaborative work, our ability to hold ITFS licenses and our ability to develop long-term agreements with our private sector partner. To curb our ability to provide video services and develop future broadband services in partnership with the private sector would have immediate and severe impact on the distribution of public affairs and educational programs in Oregon. To alter the current educational requirements for ITFS license eligibility would severely curtail our ability, and the ability of other educators, to meet an ever-growing demand for online education, health and public affairs services.

That is why we emphatically disagree with the eligibility position taken by NITV in a recent *ex parte* filing in this proceeding. NITV is an ITFS licensee that is, of course, free to advocate whatever position best serves its corporate interests. However, it is not a school or higher education institution. It is speaking for itself but emphatically not for ITFS licensees or the education community in the United States who firmly believe that such a change likely would cripple ITFS as an educational tool.

Therefore, I ask for your strong support to keep this valuable educational resource from being reduced or licensed for commercial use. Thank you for your consideration of this important matter.

Sincerely

John Greydanus
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Attachment: Oregon WIN Institutions

CC: Chairman Michael Powell
Commissioner Abernathy
Commissioner Adelstein
Commissioner Copps
John B. Muleta

Oregon ITFS Licensees

Institution and Contact

Call Signs

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Salem – A Group – WHR - 771

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Eugene - A Group - WNC 527

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